

February 24, 2015

**VIA HAND DELIVERY**

Jean D. Jewell  
Commission Secretary  
Idaho Public Utilities Commission  
472 W. Washington  
Boise, Idaho 83702

RECEIVED  
2015 FEB 24 PM 3:13  
IDAHO PUBLIC  
UTILITIES COMMISSION

**Re: Case No. IPC-E-15-01  
In the Matter of Idaho Power Company's Petition to Modify Terms and Conditions  
of Prospective PURPA Energy Sales Agreements**

Dear Ms. Jewell:

Please find enclosed an original and seven (7) copies of Micron Technology, Inc.'s Motion for Limited Admission Pro Hac Vice, on behalf of Frederick J. Schmidt, in the above referenced proceeding. Also enclosed is a proposed Order, together with self-addressed, stamped envelopes for service.

Should you have any questions regarding the enclosed, please do not hesitate to contact me. Thank you for your assistance.

Very truly yours,



Pamela S. Howland  
of Holland & Hart LLP

PSH:bcs

Enclosures

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IDAHO PUBLIC UTILITIES COMMISSION

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*Applying Counsel:*  
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Attorneys for Micron Technology, Inc.

**BEFORE THE IDAHO  
PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER )  
COMPANY'S PETITION TO MODIFY )  
TERMS AND CONDITIONS OF )  
PROSPECTIVE PURPA ENERGY SALES )  
AGREEMENTS )  
 )  
 )  
 )

CASE NO. IPC-E-15-01  
**MOTION FOR LIMITED  
ADMISSION PRO HAC VICE**

PURSUANT TO Idaho Public Utilities Commission Rule 43(03) and Idaho Bar Commission Rule 227, the undersigned local counsel, Pamela S. Howland, hereby petitions the Idaho Public Utilities Commission ("Commission") for admission of Frederick J. Schmidt, the undersigned Applying Counsel, for the purpose of the above-captioned matter.

Frederick J. Schmidt certifies that he is an active member in good standing with the bar of the state of Nevada; that he maintains the regular practice of law at the above-noted address;

MOTION FOR LIMITED ADMISSION *PRO HAC VICE*  
IPC-E-12-24

and that he is neither a resident of the state of Idaho nor licensed to practice law in Idaho. *See* Exhibit 1, attached hereto. He further certifies that he, to the best of his knowledge, was previously admitted *pro hac vice* in the state of Idaho in 2011 for three cases before the Commission, Case Number IPC-E-11-08, Case Number IPC-E-11-19 and Case Number IPC-E-11-22; in 2012 for two cases before the Commission, Case Number IPC-E-12-08 and IPC-E-12-14; and in 2013 for Case Number IPC-E-12-24.

The undersigned counsel certify that a copy of this Motion has been served on all other parties to the above-captioned matter, and that a copy of the Motion accompanied by a current certificate of good standing from the State Bar of Nevada, and a fee of Three Hundred and Twenty-Five Dollars (\$325.00) have been provided to the Idaho State Bar.

Pamela S. Howland certifies after reasonable investigation that the above information is true to the best of her knowledge. Further, Pamela S. Howland acknowledges that, pursuant to IBCR 227, her attendance shall be required at all Commission proceedings at which Applying Counsel appears unless she is specifically excused by the Commission. In this regard, Pamela S. Howland hereby respectfully requests that the Commission excuse her from having to appear during Commission proceedings for the above-captioned matter unless needed by Micron Technology, Inc. ("Micron").

WHEREFORE, by this Motion, Pamela S. Howland respectfully requests that the Commission perform the following:

1. Authorize Frederick J. Schmidt to participate in all proceedings before the Commission with respect to the above-captioned matter; and

2. Grant Pamela S. Howland's request to be excused from having to appear during Commission-related proceedings with respect to the above-captioned matter unless needed by Micron or otherwise required by the Commission.

Respectfully submitted this 24<sup>th</sup> day of February, 2015.

HOLLAND & HART LLP

By: 

Pamela S. Howland, ISB No. 6177

*Local Counsel*

HOLLAND & HART LLP

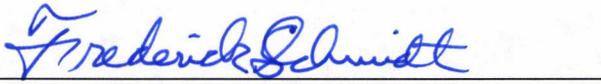
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By: 

Frederick J. Schmidt, NV Bar No. 002090

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## CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of February, 2015, a true and correct copy of the within and foregoing MOTION FOR LIMITED ADMISSION *PRO HAC VICE* OF FREDERICK J. SCHMIDT in CASE NO. IPC-E-15-01 was served in the manner shown to:

### **Commission Staff**

Jean Jewell (original, plus 7 copies)  
Commission Secretary  
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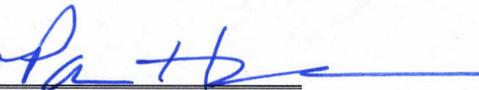
**Renewable Energy Coalition**

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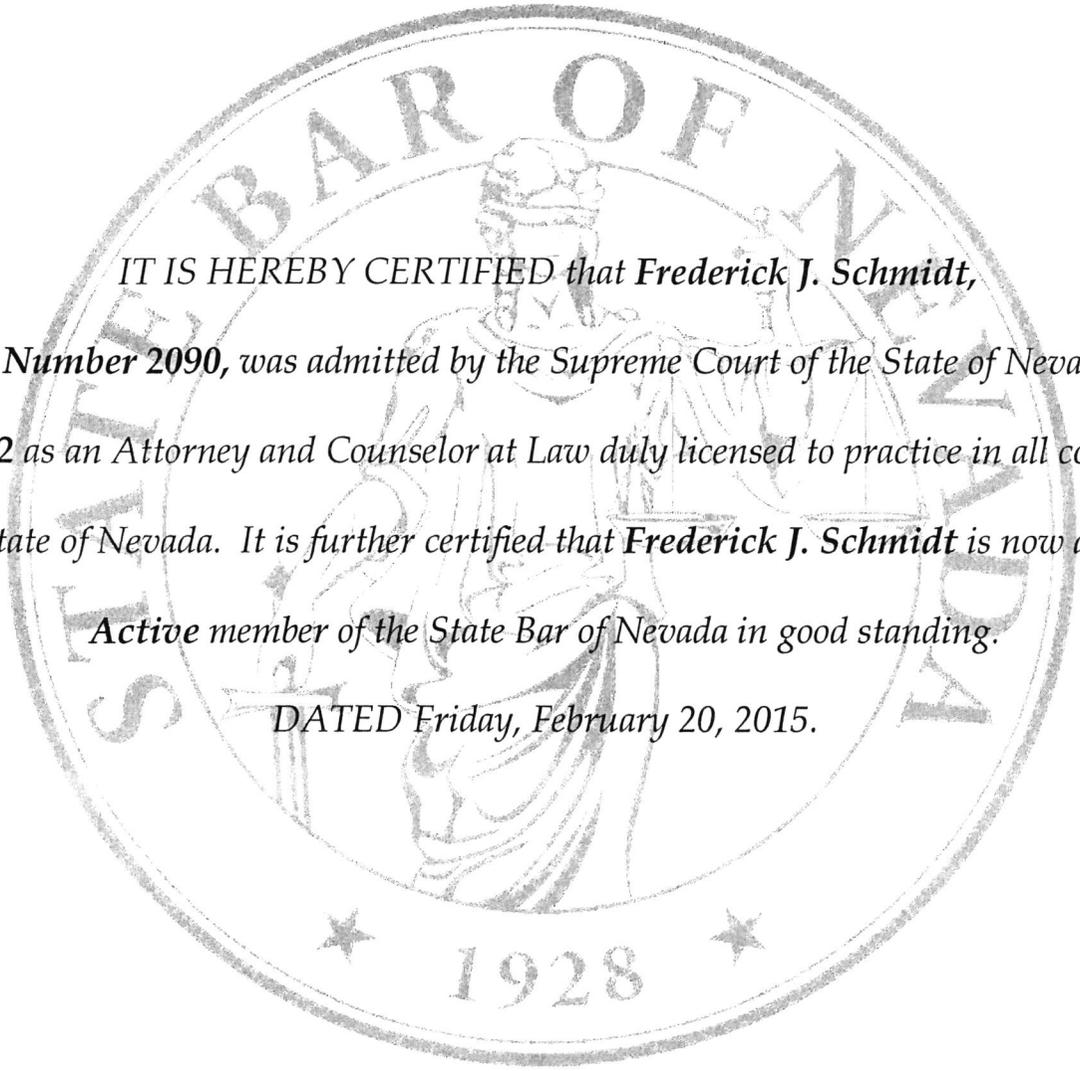
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# **EXHIBIT 1**

# *State Bar of Nevada*

## *Certificate of Good Standing*

The seal of the State Bar of Nevada is a circular emblem. It features a central figure of a woman, likely representing Justice or Liberty, holding a scale of justice and a sword. The words "STATE BAR OF NEVADA" are inscribed around the top inner edge of the circle. At the bottom, the year "1928" is flanked by two stars.

*IT IS HEREBY CERTIFIED that Frederick J. Schmidt,  
Bar Number 2090, was admitted by the Supreme Court of the State of Nevada on  
09/27/1982 as an Attorney and Counselor at Law duly licensed to practice in all courts of the  
State of Nevada. It is further certified that Frederick J. Schmidt is now an  
Active member of the State Bar of Nevada in good standing.*

*DATED Friday, February 20, 2015.*

A handwritten signature in cursive script that reads "Vanessa Dalton".

---

*Vanessa Dalton  
Member Services Assistant  
State Bar of Nevada*